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October 30, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

10/30/23 
John G. Koeltl, U.S.D.J.

Re: *Bishop v. Assumption University*,
Case No.: 1:23-cv-5857

Dear Judge Koeltl,

The undersigned represents Cedric Bishop, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Assumption University, ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for November 7, 2023, at 4:30 PM be adjourned for 60 days because Counsel for the Defendant has not yet answered or appeared in this action. Additionally, the undersigned respectfully requests that Your Honor grant an extension of 60 days to effectuate service on the Defendant. We had initially been in contact with the General Counsel for the Defendant who agreed to execute a Waiver of Service in this matter and has since not answered our multiple telephone calls and emails. This adjournment will give the undersigned ample time to serve the Complaint and grant the Defendant ample opportunity to appear and defend themselves in this Action as well as discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.

Respectfully submitted,

cc: via EMAIL

GOTTLIEB & ASSOCIATES

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/s/Michael A. LaBollita, Esq.
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